1	NICHOLAS A. TRUTANICH United States Attorney	
2	District of Nevada Nevada Bar Number 13644	
3	HOLLY A. VANCE Assistant United States Attorney United States Attorney's Office 400 S. Virginia Street, Suite 900 Reno, NV 89501 (775) 784-5438 Holly.A.Vance@usdoj.gov	
5		
6		
7		
8	Attorneys for Respondents	
9	UNITED STATES DISTRICT COURT	
10	DISTRICT OF NEVADA	
11	Amaria Dashaca Massa	) Casa Na 2,20 0121/ IAD EIV
12	Aracely Pacheco Moran,	) Case No. 2:20-cv-01316-JAD-EJY )
13	Petitioner, v.	) Stipulation and Order for Extension of Time
14	Chad Wolf, Acting Secretary of Homeland	) (First Request)
15	Security; Matthew T. Albence, Deputy Director and Senior Official Performing the	) )
16	Duties of the Director for U.S. Immigration and Customs Enforcement; Kenneth T.	) )
17	Cuccinelli, Senior Official Performing the Duties of Director, U.S. Citizenship and	) )
18	Immigration Services; Unknown Does Defendants 1-100, inclusive,	
19	Respondents.	
20	Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Petitioner and Respondents	
21   22	through undersigned counsel, stipulate and request that the Court approve a 21-day	
23	extension of time, from September 14, 2020 to October 5, 2020, for Respondents to file a	
24	response to the Amended Complaint for Injunctive and Mandamus Relief ("Amended	
25	Complaint") (ECF No. 17).	
26	Defense counsel's office has been inundated with emergency COVID-19-related	
27	motions and she is assisting with handling that litigation. The deadlines in those cases are	
28		

## Case 2:20-cv-01316-JAD-EJY Document 25 Filed 09/11/20 Page 2 of 2

1 shortened and require prompt action. Under the circumstances, good cause exists to extend 2 the time for Respondents to file their response to the Petitioner's Amended Complaint. See 3 Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the 4 court may, for good cause, extend the time...with or without motion or notice if the court acts, 5 or if a request is made, before the original time or its extension expires[.]") (emphasis added). 6 This is the first request for an extension of time. This stipulated request is filed in good 7 faith and not for the purpose of undue delay. 8 Respectfully submitted this 11th day of September 2020. 9 10 MILLENIUM LEGAL LLC NICHOLAS A. TRUTANICH United States Attorney 11 12 /s/ Brian J. Ramsey /s/ Holly A. Vance BRIAN J. RAMSEY, ESO. HOLLÝ A. VANCE 13 Nevada Bar No. 5507 Assistant United States Attorney 5258 South Eastern Avenue, Suite 252 14 Las Vegas, Nevada 89119 Attorneys for Respondents 15 Attorney for Petitioner 16 IT IS SO ORDERED: 17 18 19 20 **DATED:** September 11, 2020 21 22 23 24 25 26 27 28